

April 20, 1984

Mr. Anthony Holoska
Remedial Response Branch
U.S. EPA, Region V 5HR
230 S. Dearborn Street
Chicago, Illinois 60604

Dear Mr. Holoska:

Messrs. Jerry Myers, Maury Walsh, Mark Besel (DHMM-CO) and Dave Strayer, (DHMM-SWDO) have reviewed the draft Skinner RAMP dated July 8, 1983 and offer the following comments:

<u>Page</u>	<u>Section, Paragraph</u>	<u>Comment</u>
General		Ohio EPA has reviewed and commented on this RAMP with the expectation that review and comment opportunities will be extended prior to all practicable decision points in the future (work plan, sampling plan, etc.).
1-3	2nd bullet	The availability of lab results should be further investigated prior to the RI. Mr. Strayer or a member of his staff can provide more complete information.
1-5		Ohio EPA concurs with the need of some warning and/or advisory notices but we feel that the need for a gate and/or fencing via a Superfund IRM should be further evaluated by both Ohio EPA and U.S. EPA.
1-6	1.6.2 6th bullet	Is the magnetometer survey intended to identify the extent of the landfill?
1-7	bullets and as appropriate	A reordering of the bullets (environmental, engineering, economic) should be considered for the casual reader of the public RAMP.
Fig. 1-1 Fig. 1-2		Ohio EPA is unable to comment upon the appropriateness of the costs presented. A translation of this effort into work hours would be needed for such input.
Fig. 2-2		The source of this map (USGS topo quad?) should be cited. (Also Fig. 2-4)
2-4		It is noted that the Butler County Health Department is the appropriate permitting agency. (Ohio EPA oversees the <u>overall</u> adequacy of the individual programs.)

- 2-7 Identification of PRP's in this RAMP is inconsistent with the policy evidenced to date at other Ohio sites.
- Table 2-1 Inclusion or categorization of results would be helpful. Is information available via U.S. EPA or SWDO?
- Table 2-2 Typo: lab number.
- 2-12 The third paragraph under Section 2.4.2 discusses boring drilled near the lagoon while a reference on page 1-3 states that the area of the lagoon is not defined. Later references also discuss or depict the lagoon area. These various references need to be reconciled so that it is clear that, while the area is generally known, it is the exact location and extent of the covered lagoon which is undefined.
- Table 2-3 These residential well logs appear to be based on data collected during past SWDO investigations. Subsequently, a public water supply was made available and many of these private wells are presumably abandoned. The continued existence and use of private wells should be verified and statements in the RAMP concerning their presence and the proposals to sample these wells revised as necessary.
- 2-18 1st line "wells are" is repeated.
- 2-26 1st bullet The existence of site materials as of a certain date should be specified rather than using present tense.
- 3-1 IRM's. See comment page 1-5. (The owner's approval and/or cooperation is necessary for any successful IRM type efforts.)
- Fig. 3-1 Revise as appropriate (No IRM).
- 3-4 3.2.2 Delete or revise entire section.
- 3-6 References to the Ohio State Board of Health (OSBH) should be changed to the Ohio Department of Health (ODH). It seems probable that those dwelling in the site area are already cognizant of the previous disposal activities at the site but may not appreciate the potential health implications. Some contact by state or local health officials may be appropriate.

- 3-6 The suggested 0.5 mile radius for contacting residents with an advisory notice seems completely arbitrary. A general advisory in the local media, via local officials and/or as part of a public meeting might be more effective. It is also unclear in the RAMP who will be responsible for that public meeting.
- Fig. 3-4 (See comment Fig. 1-1.)
- 3-14 It is proposed to sample 50 of roughly 250 drums and 20 of roughly 60 tanks in order to characterize the surface wastes onsite. While this may be sufficient if a number of visually similar containers/waste streams are present at the site, the ability to perform additional sampling and analyses should be reserved if needed to fully define disposal categories for subsequent removal actions.
- 3-15 Groundwater monitoring will need comply with Ohio EPA regulations unless deviations are obtained.
- 3-16 Ohio EPA expects to comment on more specific procedures to be outlined by U.S. EPA's contractor prior to well installation. As an informational note, rotary drilling techniques for hydrogeological investigations are of concern owing to the potential for the water used during drilling operations to cause "mounding" and produce at least short-lived artificially high piezometric levels.
- 3-18 Task 3-3 (See comment re Table 2-3.) Also, the sampling method should be discussed and approved by both agencies.
- 3-19 Task 304 Add statement noting that sampling type and locations will be in accordance with approved (OEPA and USEPA) sampling plan.
 2nd par.
- 3-21 What is the rationale for EP Toxicity for sediment samples rather than "total" analysis.
- 3-24 What chemicals and lifeforms will be targeted for bioaccumulation studies or what will be the criteria for choosing? (To be based on water and benthic samples from the several ponds on the site?)
- Table 3-1 (See comments re Fig. 3-1.)
- 3-28 to 30 State review or input should be included where similar EPA activities are indicated. Consideration should be given to specifying the sampling plan as a separate deliverable.

Mr. A. Holoska
April 20, 1984
Page 4

Ohio EPA appreciates the opportunity provided us to review this document and note also that we would welcome the opportunity to elaborate upon our comments. Please contact me at 614/462-8947 with any questions or comments concerning this matter.

Sincerely,



Mark E. Besel
Unregulated/Superfund Sites Section
Division of Hazardous Materials Management

MEB/maf

cc: Roger Hannahs, DHMM-CO
Dave Strayer, SWDO
Skinner Project File
File

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